
**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
V.	:	18-CR-97
	:	
ROSS ROGGIO	:	
ROGGIO CONSULTING, LLC	:	

MOTION TO WITHDRAW AS COUNSEL

Defense Counsel: Jason A. Shrive, Esquire, of SHRIVE LAW, LLC, Curt M. Parkins, Esquire, and Matthew T. Comerford, Esquire, of COMERFORD LAW, hereby move this Honorable Court to withdraw as counsel for the Defendants, Ross Roggio and Roggio Consulting, LLC, in the above-captioned matter, and in support thereof, aver as follows:

1. Attorneys Curt M. Parkins and Matthew T. Comerford, of Comerford Law, entered their appearance as counsel for the Defendants on August 9, 2022.
2. Attorney Jason A. Shrive, of Shrive Law, LLC, entered his appearance as co-counsel for the Defendants, on August 10, 2022.
3. Defense Counsel have been representing the Defendants in this matter since their aforementioned Entry of Appearance.
4. On or about November 10, 2022, Defense Counsel received an e-mail correspondence, on behalf of Defendant, Ross Roggio, notifying Defense Counsel of the termination of their legal services. Said e-mail advised that a letter was being sent simultaneously to the Court.
5. On November 15, 2022, Defense Counsel received a letter dated November 7, 2022, from the Defendant, Ross Roggio, addressed to the Honorable Robert D. Mariani,

wherein the Defendant, Ross Roggio, requests the Court to permit him to retain new legal counsel. (Doc. 181-SEALED)

6. This Honorable Court entered an Order dated November 16, 2022, granting the Defendants' request in part and denying it in part. (Doc. 122). The Court agreed that the Defendant was permitted to terminate privately retained counsel, and ordered that Attys. Parkins, Comerford, and Shrive were to continue representation of the Defendants, until new counsel entered their appearance. The Court denied the Defendant's request to file further pretrial motions.
7. The Defendant filed a *Pro Se* Motion for Reconsideration of the Court's Order (Doc. 122), by way of a letter dated November 21, 2022 (Doc. 187). The Defendant requested the Court to reconsider its ruling denying the filing of further pretrial motions and requested in the alternative that the Court appoint new counsel to represent him.
8. Defense Counsel and the Defendant have attempted to work out their differences through recent telephone conferences and an in-person meeting, however, the relationship is irretrievably broken.
9. The Defendant informed Defense Counsel today, December 13, 2022, that after carefully considering his options, he would not proceed forward with Defense Counsel representing him, that he has been unable to privately secure alternative counsel, and that he would be sending a letter to the Court to renew his request for the Court to appoint him new counsel.
10. It is clear now that there has been a significant breakdown in the Attorney/Client relationship and that irreconcilable differences will no longer permit Defense Counsel to adequately and effectively represent the Defendants in this matter.

11. Based upon the foregoing, Defense Counsel respectfully requests this Honorable Court for permission to immediately withdraw as counsel for the Defendants in the above-captioned matter.

WHEREFORE, Defense Counsel respectfully requests this Honorable Court to grant permission to immediately withdraw as counsel for the Defendants in the above-captioned matter.

Respectfully Submitted

Shrive Law, LLC

/s/ Jason A. Shrive

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